

Rachel R. Obaldo
Assistant Attorney General
Office of the Attorney General of Texas
Bankruptcy & Collections Division
P. O. Box 12548 MC008
Austin, Texas 78711-2548
Telephone: (512) 463-2173
Facsimile: (512) 936-1409
rachel.obaldo@oag.texas.gov

Attorney for the State of Texas

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 19-23649(RDD)
)

) (Jointly Administered)
)

**THE STATE OF TEXAS'S JOINDER TO
THE STATE OF FLORIDA'S OBJECTION TO MOTION
OF DEBTORS PURSUANT TO 11 U.S.C. § 105(A) AND 363(B) FOR ENTRY
OF AN ORDER AUTHORIZING AND APPROVING SETTLEMENT TERM SHEET**

Through its Attorney General, the State of Texas, a creditor and party-in-interest in this action, joins *The State of Florida's Objection to Motion of Debtors Pursuant to 11 U.S.C.*

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

§ 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet
[ECF No. 4413] (the “Objection”)² filed on March 4, 2022, and states as follows:

JOINDER AND STATEMENT

1. The State of Texas joins in the Objection to the *Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* [ECF No. 4410] (the “Motion”), by which the Debtors seek approval of a settlement term sheet among the Debtors, the Sackler Mediation Parties, and eight States and the District of Columbia. **The State of Texas does not object to settlement insofar as it seeks to provide States with additional value to be dedicated to desperately needed opioid abatement efforts.** However, the State of Texas objects to any aspect of the settlement that provides disproportionately favorable treatment to the eight States and the District of Columbia over other States not party to the settlement. For the reasons set forth in the Objection, any funds to be distributed to the States under the settlement for abatement efforts must be distributed to all States in accordance with the previously agreed upon allocations approved by this Court.

WHEREFORE, the State of Texas, through its Attorney General, respectfully requests that the Court deny the Motion insofar as it seeks to provide the eight States and the District of Columbia with disproportionately favorable distributions in contravention of the allocation previously established in these cases.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

Dated: March 7, 2022

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

RACHEL R. OBALDO
Assistant Attorney General
Chief, Bankruptcy & Collections Division

/s/ Rachel R. Obaldo
RACHEL R. OBALDO
Admitted Pro Hac Vice
Office of the Attorney General of Texas
Bankruptcy & Collections Division
P. O. Box 12548 MC008
Austin, Texas 78711-2548
Telephone: (512) 463-2173
Facsimile: (512) 936-1409
rachel.obaldo@oag.texas.gov

ATTORNEY FOR THE STATE OF TEXAS

CERTIFICATE OF SERVICE

The undersigned certifies that on March 7, 2022, a true and correct copy of *The State of Texas's Joinder to The State of Florida's Objection to Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* was filed electronically with the Clerk of the Court using CM/ECF system which in turn sent notifications of such filing to all interested parties of record.

/s/ Rachel R. Obaldo

RACHEL R. OBALDO